

# Informal Communication

To: Examiner Michael Pham  
Fax: 571-273-3924

From: Stephen Pang (Reg. No. 38,575), 650-324-6330  
Townsend and Townsend and Crew LLP

Date: June 17, 2009

Re: Application No. 10/766,758 filed January 27, 2004  
Proposed Agenda for Interview

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Examiner Pham:

Please find below an outline of the points I propose to discuss in an interview for the above referenced application. Please let me know what time early next week would work for you.

**I. Vora discloses retrieving a design fragment and storing it as part of a model:**

- Insertion into a model:

*Next at step 330, the selected reusable design component is inserted into the user's model. A single new model object is added to the model data. The new model object is a design fragment created from the design fragment data. Col. 9, l.18-20, emphasis added.*

- Step 330, Fig. 3.



Figure 3

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- Each use of a design component adds one copy to the model:

*Each use of the reusable design component in the model 175 only adds a single additional model object to the model data 170. Col. 7, l.31-32, emphasis added.*

- With respect to claim 23, the Examiner incorrectly asserted Vora col. 6, 1.41-45 included “a reference.”

*Once selected, a single model object for the selected design fragment is added to the model data 170. Col. 6, l.41-45, emphasis added.*

## II. **Embodiments of the present invention reference other models:**

- Insertion distinguished in background of the present invention:

*[0010] Disadvantages to these approaches include that subsequent changes to the original model template, after the object template was used, are not propagated to the created object. Instead, any changes to the object template would have to be manually propagated to the objects that used the template.*

- Referencing allows model updates to be automatically propagated:

*[0067] In the present embodiment, each time a model is referenced, the object creation environment retrieves the latest copy of the referenced model stored in the storage system. Thus, for example, in the situation above, when the user initially defines a lower arm model, a hand model specifies four fingers. Later, the hand model is updated to include five fingers. Subsequently, when the user re-opens the lower arm model, the object creation environment references the latest hand model that specifies five fingers. Because a copy of the referenced object not stored in the new object model, in embodiments, the environment requests the latest "released" or "checked-in" object models. In this embodiment, the referencing functionality is provided to the object creation environment so that it opens the correct reference model, and applies the appropriate set attributes. Emphasis added.*

- Example of use of the term “reference” in the patent application:

*[0064] An example of an object model that references another object model is illustrated below. In this example, a first object model stored in the file name "GenericCharacterRig.gpto" was created in Pixar's Geppetto environment. Then, a second object model was created with the file name "Bob.gpto" in Pixar's Geppetto environment. While defining the second object model, the modeler / animator referenced the first object model, and defined values for the public attributes. Then, the second object model was saved. A portion of *untitled.gpto* is as follows:*

*[0065] bob.gpto*

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```
[0066] #gepetto magic v3.6 $RCSfile$ $Revision$  
[0067] model "bob" {  
[0068]     networkVersion = 1;  
[0069]     nextId = 28472;  
[0070]     boneRoot = 4;  
[0071]     geomRoot = 3;  
[0072]     deformRoot = 7;  
[0073]     modelReference "GenericCharacterRig(105)" {  
[0074]         modelName = GenericCharacterRig;  
[0075]         modelFile = GenericCharacterRig/GenericCharacterRig.gpto;  
[0076]         rootProxies = 106 107 108 ;  
[0077]         deformerContainerProxy "GenericCharacterRig(108)" {  
[0078]             publicPath = /GenericCharacterRig;  
[0079]         }  
[0080]         geomContainerProxy " GenericCharacterRig (107)" {  
[0081]             publicPath = / GenericCharacterRig;  
[0082]         }  
[0083]         boneProxy "CharacterRoot(106)" {  
[0084]             publicPath = /CharacterRoot;  
[0085]         }  
[0086]         geomObjectProxy "Joints_line(28153)" {  
[0087]             publicPath =  
/LHandArmature/IndexArmature/Joints_line;  
[0088]             global_2.point = 16.3526 -7.67344 0.457567;  
[0089]         }  
[0090]     }  
[0091] ...
```

[0092] As can be seen in the above example, the first object model is referenced by the following code: "modelReference " GenericCharacterRig (105)" ... modelFile = GenericCharacterRig/GenericCharacterRig.gpto" Additionally, public attributes of GenericCharacterRig.gpto are specified and set by the following code: " publicPath = LHandArmature/IndexArmature/Joints\_line; global\_2.point = 16.3526 -7.67344 0.457567

- Proposed amendment to claim 21:  
storing a reference to the second computer graphics model, but not the second computer graphics model, in the first computer graphics model.